IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

MICHAEL D. WATSON, JR. IN HIS OFFICIAL CAPACITY AS SECRETARY OF STATE AND TRUSTEE OF THE PUBLIC TIDELANDS TRUST)))
Plaintiff,)
v. UNITED STATES ARMY CORPS OF ENGINEERS, <i>et al.</i> Defendants,) Case No. 1:19-cv-00989-LG-RPM))
and))
STATE OF LOUISIANA,)
Defendant Intervenor.)

SECOND MOTION FOR JURISDICTIONAL DISCOVERY

COMES NOW, Michael D. Watson, Jr. (formerly Delbert Hosemann), in his Official Capacity as Secretary of State and Trustee of the Public Tidelands Trust (hereinafter "Plaintiff"), and respectfully submits this his Second Motion for Jurisdictional Discovery to prepare a response to the Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), [Dkt. 14], filed by the Mississippi River Commission and the U.S. Army Corps of Engineers ("Defendants") in this matter.

For the reasons set forth in its Memorandum in Support of its Second Motion for Jurisdictional Discovery, Plaintiff respectfully requests that this Honorable Court will order Defendants to supplement the record in the manner described therein, and will further order that Plaintiff is allowed to conduct meaningful discovery, including, but not limited to, the taking of

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depositions, so as to be able to effectively prosecute his case and defend against Defendants' Motion to Dismiss.

Respectfully submitted, this the 9th of October, 2020.

MICHAEL D. WATSON, JR., IN HIS OFFICIAL CAPACITY AS SECRETARY OF STATE AND TRUSTEE OF THE PUBLIC TIDELANDS TRUST

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BY: <u>s/ K.C. Hightower</u> Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have, this the 9th day of October, 2020, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which delivered a copy of the same to all counsel of record who have properly registered with the ECF system.

s/K.C. Hightower

Of Counsel